

# EXHIBIT F

CHUCHRAN v. COUNTY OF MACOMB, ET AL.

ELIZABETH ANN CANFIELD

April 11, 2017

*Prepared for you by*



**Bingham Farms/Southfield • Grand Rapids**  
Ann Arbor • Detroit • Flint • Jackson • Lansing • Mt. Clemens • Saginaw • Troy

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1 **A. Uh-huh.**  
2 Q. (Reading.)  
3 "The agency stopped accessing LEIN for  
4 civil paternity cases after being informed by  
5 staff in late 2014 of the unauthorized nature  
6 of these inquiries."  
7 So, I'll stop right there.  
8 Am I correct that it's illegal to access LEIN for  
9 civil paternity cases?  
10 **A. It is against policy, yes.**  
11 **Q. Is it also illegal or against policy to access LEIN for**  
12 **any civil purpose?**  
13 **A. Yes.**  
14 Q. And when we say "civil," I have a definition here, but  
15 as I understand it, "civil" means any matter that --  
16 where there -- well, let me get the definition.  
17 It's not part of the criminal justice system; is  
18 that correct?  
19 **A. Yes.**  
20 Q. And there is no court order that is yet involved?  
21 **A. Correct.**  
22 Q. Okay. Okay. When else did you talk to Mr. Keith?  
23 **A. Again, that's all the calls I have documented. It's my**  
24 **vague recollection that I may have spoken to him one or**  
25 **more times after that, again, regarding questions he had**

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1 **as part of the case. But we don't generally retain**  
2 **those documents in a routine complaint because the goal**  
3 **of the process is to help the agency get things**  
4 **completed and, generally speaking, dates don't come into**  
5 **it. The final case is important.**  
6 **I documented the telephone call because Mr. Keith**  
7 **had requested to make sure that we were aware that they**  
8 **had stopped using LEIN for that purpose back in 2014,**  
9 **and so I did make a note of that.**  
10 Q. And you took him at his word, I assume?  
11 **A. Yes.**  
12 Q. You did no investigation to see what they were doing or  
13 not doing?  
14 **A. We do not have authority to do that.**  
15 Q. Okay. You do not?  
16 **A. We do not.**  
17 MS. GORDON: Okay. Do you have a --  
18 BY MS. GORDON:  
19 Q. I just want to hand you some notes and see if you know  
20 who wrote these notes. It appears to be --  
21 **A. Yes, these are my notes. I'm sorry.**  
22 Q. These are your notes that we --  
23 MS. GORDON: You know, in fact, let's --  
24 MR. FLEURY: I don't know what you're referring to.  
25 MS. GORDON: I know.

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1 **A. These right here.**  
2 MR. FLEURY: What? The first paragraph? Is that  
3 what you were just talking about?  
4 **A. Right here.**  
5 MS. GORDON: Tell you what. Let's do this: I'm  
6 going to hand you Exhibit 1, just so we'll all be on  
7 the -- literally the same page with this.  
8 (Deposition Exhibit 1 marked  
9 for identification.)  
10 BY MS. GORDON:  
11 Q. Why don't you identify for the record, Ms. Canfield,  
12 each page of Exhibit 1, and then we'll have it on the  
13 record.  
14 So, the first page looks like a file folder.  
15 **A. Yes.**  
16 Q. Just a black paper.  
17 **A. Yeah.**  
18 Q. Okay.  
19 **A. The second page is the closing correspondence that was**  
20 **written December 20th, 2016, advising the Macomb County**  
21 **Prosecutor that we were satisfied with the steps that**  
22 **they took to resolve the complaint, and that it was**  
23 **closed.**  
24 **The next page is what we call our case file notes.**  
25 **This is where I document the significant events along**

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1 **the case, the opening report, the correspondence, any**  
2 **updates that occur, and then the final closing reports.**  
3 **And it's reviewed by three people before it goes up**  
4 **to Ms. Brinningstauff for final signature.**  
5 **And the final page is the opening correspondence**  
6 **that we sent on May 18th, 2016, regarding the complaint**  
7 **that we received. It documents the allegations that**  
8 **were made, or the issues that we believe we have concern**  
9 **about, and the directions to the agency and how -- the**  
10 **steps that need to be taken to resolve them.**  
11 Q. Okay. Now, I'm going to hand you something different,  
12 which is Chuchran Bates stamp 268 for the record.  
13 And those look to be notes from somebody at the  
14 Michigan State Police.  
15 Do you recognize the stamp on the bottom there,  
16 "Michigan Crime Conference, Michigan State Police"?  
17 **A. I do.**  
18 Q. Do you know what this is?  
19 **A. I believe this is -- I recognize the handwriting as**  
20 **Mr. Kevin Collins. He was the person that passed me the**  
21 **initial complaint regarding the misuse and requested**  
22 **that I open an investigation and send correspondence.**  
23 Q. Do you understand that those are notes of a conversation  
24 with Bob Chuchran?  
25 **A. Yes.**

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